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*Attorneys for Defendant Gerrit Klaerner*

15 **UNITED STATES DISTRICT COURT**  
16 **NORTHERN DISTRICT OF CALIFORNIA**

17 MICHAEL PARDI, Individually and On Behalf  
of All Others Similarly Situated,

Case No. 4:21-cv-00076-HSG

18 Plaintiff,

CLASS ACTION

19 vs.

**STIPULATION AND ORDER  
REGARDING ANSWER**

20 TRICIDA, INC., and GERRIT KLAERNER,

Assigned to: Hon. Haywood S. Gilliam, Jr.

21 Defendant.

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1 Pursuant to Civil Local Rules 6-2 and 7-12, Lead Plaintiff Jeffrey Fiore (“Lead Plaintiff”)  
2 and Defendant Gerrit Klaerner (“Defendant”) by and through their undersigned counsel, enter into  
3 the following stipulation (the “Stipulation”).

4 **WHEREAS:**

5 1. On March 11, 2024, the Court issued an order granting in part and denying in part  
6 Defendant’s motion to dismiss the Second Amended Complaint. Dkt. 145.

7 2. Pursuant to Federal Rule of Civil Procedure 12, Defendant’s deadline to answer the  
8 Second Amended Complaint is March 25, 2024.

9 3. Lead Plaintiff and Defendant have agreed to a mediation scheduled for April 9, 2024.

10 4. Defendant has requested, and Lead Plaintiff has agreed, to extend the deadline for  
11 Defendant to answer the Second Amended Complaint to May 9, 2024—30 days after the mediation.  
12 There is good cause for this modification to the schedule—this short extension will allow the parties  
13 to attempt to mediate their dispute, and would conserve resources for the parties and the Court,  
14 should the parties be able to resolve the case in mediation.

15 **NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED**, and respectfully  
16 requested, by and among the parties hereto, through their undersigned counsel of record, that the  
17 Court order that the deadline for Defendant to answer the Second Amended Complaint shall be  
18 extended to May 9, 2024.

19  
20 Date: March 14, 2024

Respectfully submitted,

21  
22 **SIDLEY AUSTIN LLP**

23 By: /s/ Sara B. Brody

24 Sara B. Brody (SBN 130222)

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28 *Attorneys for Defendant Gerrit Klaerner*

By:/s/ Jeffrey C. Block

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*Attorneys for Lead Plaintiff Jeffrey M. Fiore  
and the Class*

## **LOCAL RULE 5-1 ATTESTATION**

I, Sara B. Brody, am the ECF User whose ID and password are being used to file this Stipulation and [Proposed] Order. In compliance with Local Rule 5-1(i)(3), I hereby attest that the other signatory to this document concurred in the filing of this document.

Date: March 14, 2024

By: /s/ Sara B. Brody  
Sara B. Brody

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2 **PURSUANT TO STIPULATION, IT IS SO ORDERED.**

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5 Dated: 3/14/2024

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Haywood S. Gilliam, Jr.

Honorable Haywood S. Gilliam, Jr.  
United States District Judge